

Maine's Unified State Plan 2024-2027

Public Comments

Summary

Public comment period for the Unified State Plan was held from March 4, 2023 through March 15, 2024. A press release was issued, displayed on Maine Department of Labor websites and distributed to the Maine Department of Labor mailing list, State Board members, workforce partners, Local Board Directors, and State Board committee members and the State Workforce Board's interested parties list.

The public was invited to submit comments through e-mail, on-line comment form on the State Board website, and by US Postal service mail.

A total of 18 comments were received.

Due to differing statutory requirements¹, a concurrent comment period was held for the Agricultural Outreach Plan from February 1, 2024 through March 15, 2024 and are included in the Unified State Plan.

List of Commenters (order received)

Elizabeth Sanborn (Website submission)

John Wagner (Website submission)

Diane Peet (Website submission)

David Grima (Website Submission)

Anonymous 1 (Website Submission)

Susan Harper (Email Submission)

Douglas Grant (Website submission)

Anonymous 2 (Website submission)

Andrew Powell (Website Submission)

Anonymous 3 (Website Submission)

Patricia Brigham (Website submission)

¹ 20CFR §653.107 https://www.ecfr.gov/cgi-bin/text-idx?SID=18d4e9b9eeb62f9342aab1045afe2da7&mc=true&node=se20.3.653_1107&rgn=div8

Anonymous 4 (Website submission)

Julia Trujillo (Website Submission)

Nichole (Website submission)

Jena Jones (Website submission)

Jennifer Kimble (Website submission)

Anonymous 5 (Website submission)

Joy Gould (Email submission)

List of Comments

Elizabeth Sanborn – Website Submission

“As a current Extended Learning Opportunities coordinator at a rural Maine school which received a grant to start the program in 2022, I think the Unified State Plan is an excellent start. I do hope the state will recognize not only the need for ELO programming in schools but also the HUGE need for funding to support it. As it stands now, my district must take on 100% of the funding to keep the ELO program once the grant money is gone, and as a poorer district this is going to be a struggle every single year and every single budget cycle. My school isn't yet sure they can afford the personnel cost of keeping a coordinator for our next school year, nevermind offering meaningful paid workforce experiences for students. If the state is going to claim they want ELO programs to exist, the fact is that small districts like mine need financial assistance. I hope this is a part of the important conversations happening at the state level, because the sad reality is that no matter how wonderful the idea is, without our selectmen and taxpayers voting to take on the monetary obligations, the program will disappear. Thank you!”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

John Wagner – Website Submission

“I saw the plan wants to recognize the out of state certifications; what about military/Veteran certifications? Or even US DOL apprenticeship completions? Make it easier for them as well instead of ‘starting from scratch’”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. Recognizing an expanded set of credentials would also include those gained through military service as a veteran.

Diane Peet – Website Submission

“I would like to see Franklin, Androscoggin & Oxford Counties administered, once again, solely by Western Maine Community Action. The offices are GONE, there is no apparent training presence. Eastern Maine Dev. & Kennebec County have no business running the jobs training programs in Oxford, Andro. & Franklin Centers. A job seeker & former CC worker.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. The method of procurement that Local Boards must follow for WIOA provider procurement is detailed in 2 CFR 200.320 <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.320>. The current providers were selected through the established process.

David Grima – Website Submission

“It seems to me that we continue to put money into training individual workers, but not so much into helping employers train the workforce they need.

If employers are to seriously attain the goals of development and growth outlined in the plan, we probably need a concerted effort to reintroduce the idea of employers training their workers to meet their companies' specific long-term needs.

Employers at various levels in the economy are often still thinking in terms of the surplus of labor over jobs that existed in the Baby Boom years, where they had a reasonable expectation of hiring workers with existing skills. But these pre-trained workers are now retiring, and employers can be heard expressing concern that they are losing knowledge, skills, and abilities that cannot be replaced simply by hiring fresh workers "off the peg".

Individual workers are still being trained by the Workforce System to pursue personal careers: employers really need to be training their workforce for sustained corporate economic growth.

Just my thoughts on what I see at ground level. Thanks for listening.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

Anonymous 1 – Website Submission

“Good morning, I feel that the State Plan should indicate that DBVI provides blindness-specific services that cannot be found anywhere else. This must be documented as part of the “Plan”. As you may know blindness is a low incidence disability. There is no medical model for vision loss and rehabilitation. Vision rehabilitation supplies are not covered by insurance or Medicare. DBVI provides rehabilitation services in the form of Orientation and Mobility Training and Vision Rehabilitation Therapists. DBVI also contracts out the Catholic Charities to provide educational services for students. DBVI also contracts with The Iris Network, having people come to your home is a big part of independent living. No where in the medical model offers such services. I think it’s important to point that out and have it as part of the State Plan. I also think it’s important to point out that only 22 states offer blindness-specific only VR services. I want these services to continue for DBVI to be provider of services.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. DBVI has added the following statement to the plan, “The Division for the Blind and Visually Impaired (DBVI) provides comprehensive blindness-specific services.”

Susan Harper – Email Submission

“There are very few services for blind and VI folks now. Our voices are few, sadly. It doesn't feel like services are a priority as they continue to dwindle. Soooo who is advocating?

Does it sound like I'm happy? As a parent of a blind child, NO!

I don't need to remain Anonymous. I've been and will continue to be outspoken. Services for the blind needs to be its own service with its own funding to actually provide services to folks who in many cases can't advocate due to other comorbid issues impacting the quality of their life. Folks who are supposed to be caseworkers have no experience and are learning on the job. This leaves even more without services. That said, we do have a couple of folks providing O&M and Braille Instruction in this area who are excellent.

Are there sufficient services to impact the quality of life from our youngest to our oldest in need of DVBI services? NOT EVEN CLOSE!

Will what I say matter? Probably not!

Sue H.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

Douglas Grant – Website Submission

“Seems like the state and federal governments are doing a poor job at taking care of people but a great job of keeping people dependent on them. Would like to see taxes reduced and privatization of the whole mess. It is Maine peoples' workforce not the state governments workforce. Please keep the politicians away from my business and family.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

Anonymous 2 – Website Submission

“Thank-you for the opportunity to review the Draft of the Division for the Blind and Visually Impaired (DBVI) State Plan for 2024-2027. Too, thanks and congratulations to all who put the work into developing and updating the Plan. The request for your consideration is for the very first paragraph under the State Rehabilitation Council. Could the opening of that section include that the State Rehabilitation Council advocates and supports the specialized services provided by DBVI for Maine

individuals who are blind or visually impaired. The reason for the request is that specialized blindness services have been lost in many states and territories over the years. This is documented by many sources and currently it is reported that there are only 22 states and territories providing specialized blindness services. The Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) vrtac-qm.org covers this in great detail with research on the positive outcomes when services are provided by specialized blindness agencies. In this report it covers the research done by Mississippi State University in 2018. The research found that the outcomes for clients/consumers who were blind or visually impaired “performed as well as, if not better than, combined agencies on key outcome measures including rates of competitive employment.” The full report from Mississippi State is on the VRTAC-QM website. With the national trend of mergers happening with states and territories, it seems like a great opportunity for the DBVI and the State Rehabilitation Council to have the commitment for Specialized Services documented in the State Plan for 2024-2027. Thank-you so much for considering.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. DBVI has added the following statement to the plan, “DBVI has a State Rehabilitation Council (SRC) which advocates and supports the specialized services provided by DBVI for Maine individuals who are blind or visually impaired.”

Andrew Powell – Website Submission

“Affordable, Quality Day Care.

Like many companies we have issues with hiring enough people. Recently we have had success finding women to work "mom's hours."

Of course this part time employment does not address all of our needs. When school is out, so are all of our Mothers.

Affordable, quality day care would really help Maine grow our workforce. I would go as far as reducing unemployment benefits and investing in day care.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. Quality childcare is one of the actions identified in the refresh of Maine’s 10-Year Economic Development Plan. The action is listed as “E1: Invest in Quality Childcare.”

Anonymous 3 and Anonymous 4 – Website Submission

Both submissions requested specific services and were forwarded to the appropriate individuals for follow-up.

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. Both of these comments were asking for specific assistance with programs and were referred to the correct program staff.

Patricia Brigham – Website Submission

“Accounting is a profession with growth potential yet there is a shortage of young people entering the profession. Adding Accounting/Bookkeeping to high school, including vocational training might raise awareness of the profession. State CPA Societies are collaborating with the AICPA to have accounting designated as STEM curricula.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

Julia Trujillo – Website Submission

“(Innovation will continue to impact jobs. Most of these changes will occur gradually and play out over decades rather than years)

This is a bold statement and believe not entirely in line with the beginning of this document and with the innovation taking place across lots of industries, including Forest Products.

With an aging population, openings are expected for workers across all education levels as many reach retirement ages creating opportunities been a gradual displacement of workers in sectors of Maine’s economy focused on the production of goods (sawmills, paper mills, textile mills, shoe shops and other types of manufacturing, timber harvesting and agriculture) due to the combination of technological advances, import competition and other factors. Many communities in the Northern Rim were settled around these economic opportunities which attracted population decades ago.

I don't believe this is entirely accurate anymore. It would be great to signal the positive innovative work taking place in this county in this section.

Partnering with Maine’s Public Library System

You may want to reach out to DECD about their MJRP program with the libraries

FORMERLY INCARCERATED

Ensure common terminology is applied through the entire doc”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. Language was updated to reference “justice involved” individuals through the plan.

Nichole – Website Submission

“Small businesses need more support. Maine is failing small business owners. Many are wearing multiple hats, working extreme hours and/or closing from lack of staff. Cost- cost of labor, effects consumers- we need to stop over looking this cycle. Skilled laborers are needed- focus more funding on skilled workforce incentives, offer support and training to businesses. More training to business for diversity. More internet support in rural areas. There is HUGE abuse of our state welfare system- put people to work.

"why work the state pays me to stay home"

Raising minimum wage does nothing- money does not motivate people- we need to inspire people to be driven have a sense of purpose.

I am scared for our future if we do not address the labor shortages”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027.

Jena Jones – Website Submission

“We write out of concern that while the workforce analysis points to the importance and needs of health and personal care support jobs, Maine’s strategy does not include sufficient focus on this sector. It is well documented that Maine’s direct care workforce is in an extremely fragile state due to a historic lack of investment, which threatens individual and family well-being, costs Maine employers and our economy hundreds of millions of dollars annually and strains the health care system. Given that the need for a robust direct care and support workforce will only increase in the future, all these costs will continue to rise. In fact, a workforce analysis by PHI projects Maine will see 35,500 job openings for direct care workers by 2030, in small part due to growing need, but mostly due to our inability to retain workers. We need to confront the consequences of historic inaction and commit to meaningful change for Maine’s future. To offer some context, in its report,

The High Cost of Undervaluing Direct Care Work, the Maine Center for Economic Policy (MECEP) found:

Maine ranks 44th in access and affordability of long-term services and supports.

1 in 6 Maine people report caring for an older adult. That’s 186,000 Mainers.

A similar proportion report providing care to an adult with a disability or illness.

The average annual cost of home care services in Maine is over \$65,000 per person/per year.

Regarding strains on the health care system: In 2022, Maine’s Long-Term Care Ombudsman Program (LTCOP) received over 200 referrals from hospital patients facing barriers to finding care upon discharge. For nearly 2/3, it took more than 30 days after referral to LTCOP to be discharged; more than 1/3 took longer than 60 days to resolve.

Last month, the Department of Health & Human Services provided its AAAA report, Efforts and Progress on Implementing the Recommendations of the Commission to Study Long-term Care Workforce Issues, to the Maine Legislature’s Health & Human Services Committee. The report provides updated data on the “care gap” which refers to the discrepancy between the approved number of hours of care and the actual number of hours provided. In nearly all state-funded and Maine-care sections related to the care of older Mainers, the care gap increased between 2022 and 2023, several significantly. For instance, the percentage of older adults who were not provided all of their approved Personal Support Services and Nursing hours:

Increased from 33% to 50% in Section 19

Increased from 47% to 62% in Section 96

Increased from 53% to 71% in Section 63

Occupancy rates in Residential Care facilities declined from 86% to 73% and in a survey conducted last year by the Maine Health Care Association, 86% of facilities reported experiencing a staffing shortage.

These challenges are both related to and exacerbated by the low wages of direct care work:

Half of all direct care workers rely on some form of social assistance to meet their basic needs.

More than half of direct care workers in Maine are not provided enough income to support themselves; 40% are low-income, and 25% can't find affordable housing.

1 in 7 direct care workers earn incomes under the poverty line.

21% of direct care workers in Maine are enrolled in SNAP, compared to just 7% of all workers.

Another way these challenges affect businesses and Maine's economy is that thousands of adults are being kept out of the workforce to care for family members. MECEP estimates this results in Maine losing an estimated \$7.8 million in income, sales and excise tax revenue just for those caring for older adults. Across the state, employee turnover stemming from a need for elder care costs Maine employers upwards of \$40,000,000 per year. MECEP also estimates that Maine is sacrificing over \$1 billion per year in additional economic activity as a result of people dropping out of the labor force due to direct care challenges.

Any long-term agenda for Maine's workforce development system and its future economic well-being needs to include a focus on developing a robust direct care workforce. Investments made through the American Rescue Plan Act show the efficacy of smart investments in job quality improvements that bring recruitment and retention levels up to meet the needs of Maine's most vulnerable residents. Building on that work means developing concrete plans to increase the quality of direct care jobs, especially by ensuring workers have adequate compensation (including wages competitive with other industries). It also means reducing barriers to training and certification (e.g., by supporting apprenticeship and high school programs as well as on-the-job training) and incentivizing direct care jobs (e.g., through sign-on bonuses, public education, progressive pay scales, and career ladders). It also means addressing the lack of fiscal sustainability in the sector due, in part, to our historic underinvestment in needed services for older adults, those with disabilities and behavioral health challenges. The personal, social and public costs of our lack of investment in the direct care workforce are both too high for all involved and unsustainable."

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. The Department of Labor recognizes the importance of focus on Maine's Healthcare sector and direct care work. We are proud to lead efforts in this area to coordinate with state partners, support recruitment and advancement of workers and will continue to pursue funding opportunities to support proven strategies for the employment and training of current and future healthcare workers..

Jennifer Kimble – Website Submission

“Commission members have reviewed the Unified State Plan including the DVR and DBVI State Plans.

Feedback 1: The plan is very difficult to navigate and understand. We appreciate that the report structure may be mandated by the federal government with little adjustment possible. The “plan” content does not read like a plan but a report out on general past state performance and statements of intention for the upcoming plan period. Given this structure, content, and length of the document, it is unreasonable to expect meaningful public feedback in a 14-day public comment window.

Suggestion: as WIOA requires specific attention to “underserved populations” (such as individuals with disabilities), it would be very helpful to provide executive summaries specific to each WIOA identified underserved group, providing guidance and references to readers wishing to review and provide feedback through these lenses.

Feedback 2: There is a paucity of information related to effective service to and engagement of individuals with disabilities beyond the DVR and DBVI state plans. According to most recent data, over 108,000 working age adults in Maine self-identify as having a disability; only a fraction of Mainers with disabilities qualify for and receive services from these vocational rehabilitation programs.

Suggestion: Ensure that plan implementation includes specific strategies to engage the largely untapped workforce of Mainers with disabilities, including those not served by Vocational Rehabilitation programs.

Feedback 3: There is a paucity of information related to supporting Maine employers / businesses to recruit, hire, and retain employees with disabilities. While reference is made to the VR programs’ delivery of Windmills training and implementation of Progressive Employment strategies, these again are focused primarily on engaging employers related to the hiring of VR clients. While this is an important effort, all Maine businesses can benefit from a greater awareness of disability and employment, disability-inclusive policies and practices, and retention strategies for a newly disabled workforce.

Suggestion: The Employment First Coalition, after three years of research, collaboration, and consensus building among a diverse group of stakeholders assembled in response to the 2013 Employment First Maine Act, made 27 recommendations to the State Legislature in 2017 to improve employment outcomes for Mainers with disabilities. The Commission worked in the years following to assess the state’s response to these recommendations; by and large, state agencies were making progress in working on recommendations that related to them. However, six recommendations specific to increasing employer awareness and engagement related to disability employment had no clear ownership. Follow up on these recommendations was minimal; in the past five years, little to no progress on these recommendations has been made. It seems that it could be the role of the WIOA Unified Plan and Implementation Plan to include strategies to address these recommendations.

Comment: on pages 95 and 99 there are references to the Chamber of Commerce “Maine Workplace and Disability Connection.” This initiative is no longer in existence and references to it should be removed from the Plan.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 -

2027. The “Maine Workplace and Disability Connection” has been removed in response to the provided comment. There will be further opportunities to engage as the WIOA State Plan is put into the implementation stages. Eligibility rate to the VR program is high, almost all who apply, qualify and receive VR services. Education and outreach of the VR program is facilitated by all staff members through community engagements. With the addition of Rehabilitation Assistants, whose primary role is to be public facing, will increase public outreach.

Anonymous 5 – Website Submission

“I have read the state plan and feel it is a representation of the VR component of DBVI; but the IL component and the younger education component does not feel as though it is represented.”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. IL services are not outlined in this state plan. The younger education services are specifically outlined under the “Coordination with Education Officials” section of the state plan.

Joy Gould – Email Submission

“Attached is a track changes version of the WIOA state plan with a few comments from the DHHS team.

On page 12, there is a graph showing 4 bars, but only 2 are described.

On page 61-63, please note some language editing on the SNAP program described in the table. There are additional language changes in the appendix on pages 261-263. Let me know if you can’t see the track changes in that table.

I also highlighted a few places that jumped out as areas where collaboration already exists. and we look forward to continuing the great momentum already underway. We have a shared goal of reducing barriers to employment for certain populations including participants accessing SNAP, Parents as Scholars, and Aspire resources. There are a few places where MOUs were referenced. Who is taking the lead on drafting those MOUs as well as the coordination around the Learner Referral System?

We appreciate the great partnership with MDOL and thank you for sharing the WIOA state plan with us. Let me know if you have any questions or need more information.

Thanks again!”

Response: We appreciate you taking the time to provide comments on the WIOA State Plan for 2024 - 2027. On page 12, there was a formatting issue that hid two of the keys, this has been fixed in the State Plan. We appreciate you taking the time to provide language changes and have incorporated those into the state plan. Local Workforce Boards were charged with creating MOUs with the necessary staff at DHHS and have done so.